Application No.: 10/086964 Docket No.: ILOC-P01-001

## **REMARKS**

Claims 11-19 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Claim 11 has been canceled. Claims 12-19 now depend from claim 20.

Claims 1, 3, 4, 6-11, 13, and 15-20 stand rejected under 35 U.S.C. §102(b) as being anticipated by Sklar et al. (US 5,790,212), hereinafter "Sklar".

The present invention is directed, *inter alia*, to "compact visualizations" of large data structures, wherein a compact visualization can be rendered in time directly proportional of the number of records held in a table instance, plus a sorting phase. One of the benefits of the described "compact visualization" is that Sorting is done after Clustering, so that Sorting is performed on smaller lists, resulting in significant optimization. At least the step of "sorting the clustered records in a predetermined order defined by a sort parameter value in the visualization set of parameters," as recited in claims 1 and 20, distinguishes the present application over the Sklar reference.

Although the Office Action asserts that "Sorting" may be inherent in the examples and embodiments of Sklar, Sklar mentions "Sorting" only once in the description by suggesting that "a clustering process might prove to be highly useful in sorting through corporate data," (col. 3, lines 55-56). Sklar, however, fails to teach or suggest sorting the clustered records, which is one of the characteristic feature of the disclosed compact visualization.

Since Sklar fails to disclose each and every element and/or feature of claims 1 and 20, Applicant respectfully requests that the rejection of claims 1 and 20 over Sklar under 35 U.S.C. 102(b) be withdrawn.

Sorge (US 6,613,098), applied against claims 5 and 14, also fails to disclose at least "sorting the clustered records".

Claims 2-10, which depend from claim 1, and amended claims 12-19, which depend from claim 20, should therefore be patentable for the same reasons that claims 1 and 20 are patentable over the references of record.

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New claim 21 has been added to recite additional features of the method of the invention. Claim 21 also recites "sorting the groups of records" as a characteristic feature of compact visualization. Support for the operation of "Synthesizers" can be found, for example, on page 10, line 12, to page 11, line 25, of the instant specification.

Sklar does not disclose the use of Synthesizers and Local variables as means to introduce state-handling capabilities in a graphical rendering dataflow. The graphic primitive attributes (such as position) and decoration attributes in Sklar depend exclusively from the values held in the associated data objects or from predetermined global values; they cannot be made dependent on incrementally computed values, for instance to place the object next to one another instead of according to a predefined location or a location, as recited in claim 21.

One of the consequence of the ability to handle the state through local variables is the ability to place graphic representations next to one another independently of their data values, as an histogram or a treemap, which is not disclosed by Sklar.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

We believe that we have appropriately provided for fees due in connection with this submission. However, if there are any other fees due in connection with the filing of this Response, please charge the fees to our Deposit Account No. 18-1945, under Order No. ILOC-P01-001 from which the undersigned is authorized to draw.

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Respectfully submitted.

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